

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143

Honorable T.S. Ellis, III

Trial: October 19, 2021

**MOTION TO SEAL**

The defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court for entry of an Order permitting the defense to file under seal portions of Mr. Sanders's Memorandum in Support of his Renewed Motion to Suppress Based on Warrantless Use of a Network Investigative Technique and False Material Information in Affidavit Paragraph 25, and the entirety of exhibits 3 through 6. Mr. Sanders relies on the accompanying Memorandum as grounds for this motion.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of September 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

*/s/ Jonathan Jeffress*  
Jonathan Jeffress